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PRMT SECTION

DEPARTMENT OF HEALTH AND ENVIRONMENT Forbes Field

Topeka, Kansas 66620-0001 Phone (913) 296-1500

Mike Hayden, Governor

Stanley C. Grant, Ph.D., Secretary Gary K. Hulett, Ph.D., Under Secretary

March 16, 1988

Mr. David Trombold Hydrocarbon Recyclers, Inc. 2525 North New York Wichita, Kansas 67219-4322

Re: Closure Plan for Waste Tanks and Trailer

EPA I.D. Number KSD007246846

Dear Mr. Trombold:

I have reviewed the closure plan dated January 8, 1988 for the two hazardous waste tanks and the tank trailer. The following comments should be addressed before the plan can be made available for public comment.

- 1. The closure plan should include a statement of the closure performance standards contained in 40 CFR 265.111.
- 2. The closure plan should detail how each individual unit will be closed in accordance with 40 CFR 265.112(b)(1).
- 3. The closure plan does not specify that the piping attached to the tanks is to be decontaminated. The piping should be cleaned so that it will not present a hazard while it is being stored prior to its reuse in the new facility. Please detail how the piping is to be cleaned, and how and where it will be stored.
- 4. The closure plan should include a site map and facility drawing which details the location of the units to be closed, the exclusion zone around the units, the decontamination area, and any support facilities for the closure operations.
- 5. The plan should include a detailed description of the maximum extent of operation and the maximum inventory of wastes contained by the units to be closed as required by 40 CFR 265.112(b)(2) and (3).
- 6. The plan should detail how waste and waste waters produced by the cleanup will be retained, collected, and disposed of as required by 40 CFR 265.112(b)(4). A detailed diagram of the exclusion zone around the units to be closed may be helpful in conjunction with the description.



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- 7. A detailed description of the soil sampling to be performed should be provided in the closure plan. Please include a description of the sample locations, sample collection and compositing procedures, and the QA/QC procedures to be followed for the closure plan..
- 8. Please detail the criteria which will be used to decide if further decontamination of the tank areas is required.
- 9. The time required for certification and submission of the closure report should be included in the closure schedule outlined in the closure plan.
- 10. A brief description of closure activities anticipated to have occurred before approval of the closure plan by KDHE should be included. Please indicate the approximate dates at which these events are scheduled to have occurred.
- 11. A statement indicating that the closure procedures will result in complete removal of all hazardous wastes allowing exemption from the requirements of 40 CFR 265.116 through 40 CFR 265.120 should be included in the closure plan.

I would also recommend that you closely follow the example of an earlier meeting. This would expedite approval of the plan. Please address the above comments and return a revised closure plan to me by April 15, 1988. If you have any questions, please feel free to call me at (913) 296-1613.

Sincerely yours,

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Martin L. West Environmental Engineer Hazardous Waste Section Bureau of Waste Management

sc/david.mlw C Dale Stuckey Wes Bartley